Mr. Michael Beam
Bomarko, Inc.
1955 North Oak Road, P.O. Box K
Plymouth, Indiana 46563

Re: **099-14912-00021**
Second Administrative Amendment to
Part 70 099-7713-00021

Dear Mr. Beam:

Bomarko, Inc. was issued a permit on March 11, 1999 for a stationary waxed and coated paper and foil roll and sheeted stock manufacturing operation. A letter requesting a change was received on October 4, 2001. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Bomarko, Inc. has submitted an application to remove all conditions pertaining to rotogravure printing press No. 6 and its associated catalytic oxidizer because the press and oxidizer have been permanently removed.

Upon review of the existing Title V permit, the following changes are made as a result of this request. New permit language is represented in bold. Language that is removed is struck out.

Condition A.2:

Condition A.2 shall be amended as follows to remove press No. 6.

(1) ……
~~(6) one (1) packaging rotogravure printing press (ID No. 1-2-P6), with a maximum line speed of 800 feet per minute and a maximum printing width of 32 inches, with a catalytic incinerator for VOC control, exhausting through one (1) stack (ID No. 1-3-INC-1);~~
(~~7~~**6**) one (1) flexographic printing press (ID No. 1-2-P7), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
(~~8~~**7**) one (1) rotogravure printing press (ID No. 1-2-P8), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
(~~9~~**8**) one (1) flexographic printing press (ID No. 1-2-P9), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1);
(~~10~~**9**). one (1) flexographic printing press, identified as PW2, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches; and
(1~~0~~**0**). one (1) paper-fired boiler (ID No. 1-1A-J), also burning natural gas at a maximum heat input rate of 3.0 million British thermal units (MMBtu) per hour, with a woven fiberglass fabric baghouse for PM control, exhausting through one (1) stack (ID No. 1-1A-J-1).

Section D.1 Facility Description:

The facility description of Section D.1 shall be amended as follows to remove press No. 6.

Facility Description [326 IAC 2-7-5(15)]

(1) .....
~~(6) one (1) packaging rotogravure printing press (ID No. 1-2-P6), with a maximum line speed of 800 feet per minute and a maximum printing width of 32 inches, with a catalytic incinerator for VOC control, exhausting through one (1) stack (ID No. 1-3-INC-1);~~
(~~7~~**6**) one (1) flexographic printing press (ID No. 1-2-P7), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
(~~8~~**7**) one (1) rotogravure printing press (ID No. 1-2-P8), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
(~~9~~**8**) one (1) flexographic printing press (ID No. 1-2-P9), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1); and
(~~10~~**9**) one (1) flexographic printing press, identified as PW2, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches.

Condition D.1.1:

Condition D.1.1 shall be amended as follows to remove all references and requirements pertaining to press No. 6.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5] [326 IAC 2-2]

Pursuant to 326 IAC 8-5-5, the Permittee may not cause, allow, or permit the operation of Presses 1-2-P3, 1-2-P4, 1-2-P5, ~~1-2-P6~~, 1-2-P7, 1-2-P8, and 1-2-P9 employing solvent-containing ink unless:

(a).....

~~(f) A catalytic incinerator shall be used to control VOC emissions from the packaging rotogravure Press 6 (ID No. 1-2-P6) to comply with 326 IAC 8-5-5, and shall maintain at least a 90% VOC destruction efficiency as per (c)(2) above, and a 65% overall control efficiency as per (e)(2) above. Any of the other compliance methods listed in paragraphs (a) through (e) above may be used to achieve compliance with 326 IAC 8-5-5 for Press 6 as an alternative to the use of the catalytic incinerator.~~

(~~g~~**f**) To ensure that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply, the input of VOC to the nine (9) presses and the usage of cleanup solvent for the nine (9) presses [the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent] shall be limited to 239.65 tons used per 12 consecutive months period. This limitation will prevent the VOC emissions from the entire source being greater than 249 tons per year.

Condition D.1.3:

The testing requirements of Condition D.1.3 shall be amended as follows because the testing pertains to press No. 6 only.

~~D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

~~During the periods specified in condition D.1.4 below, after issuance of this permit, the Permittee shall perform VOC testing on the catalytic incinerator, controlling VOC emissions from Press 6 (ID No. 1-2-P6), utilizing Method 25, or other methods as approved by the Commissioner to determine the operating parameters necessary to show compliance with Condition D.1.1. This test shall be repeated at least once every thirty (30) months from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.~~

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to perform compliance stack tests at this time. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Condition D.1.4:

Condition D.1.4 is removed because it pertains to press No. 6 only.

~~D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-12]~~

~~(a) Pursuant to 326 IAC 8-1-12, by May 1, 1997, or upon startup of a new coating facility, or upon changing the method of compliance for an existing coating facility, the Permittee shall comply with the following requirements:~~

~~(1) Control system operation, maintenance, and testing requirements for Press 6 (ID No. 1-2-P6) shall be as follows:~~

~~(A) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of the department.~~

~~(B) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and department inspectors.~~

~~(C) The control system shall be tested according to the following schedule and in the following situations:~~

~~(i) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.~~

~~(ii) A compliance test shall be conducted whenever the owner or operator chooses to operate a control system under conditions different from those that were in place at the time of the previous test.~~

~~(iii) A compliance test shall be performed within ninety (90) days of:~~

~~(AA) startup of a new coating facility;~~

~~(BB) changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or~~
~~(CC) receipt of a written request from the department or the U.S. EPA.~~

~~(D) All compliance tests shall be conducted according to a protocol approved by the department at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:~~

~~(i) Test procedures.~~
~~(ii) Operating and control system parameters.~~
~~(iii) Type of VOC containing process material being used.~~
~~(iv) The process and control system parameters that will be monitored during the test.~~

Condition D.1.5:

Condition D.1.5 is renumbered to D.1.4 because Condition D.1.4 is removed.

D.1.5**4** Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Condition D.1.6:

Condition D.1.6 is removed because it pertains to press No. 6 only.

~~D.1.6 Volatile Organic Compounds (VOC)~~

~~The catalytic incinerator for VOC control shall be in operation at all times when Press 6 (ID No. 1-2-P6) is in operation unless an alternative compliance method as listed in 326 IAC 8-5-5(c) is used to comply with the requirements of 326 IAC 8-5-5.~~

Condition D.1.7:

Condition D.1.7 is removed because it pertains to press No. 6 only.

~~**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**~~

~~D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-12] [326 IAC 8-5-5]~~

~~Monitoring equipment requirements for Press 6 (ID No. 1-2-P6) shall be as follows:~~

~~(a) Since a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-~~

~~tenths degree Centigrade (± 0.5°C), whichever is more accurate. The oxidizing zone minimum temperature shall be 550°F.~~

~~(b) Measure and record each day the air flow rate through the catalytic incinerator to ensure the capture efficiency of the incinerator meets the minimum required capture efficiency required in Condition D.1.1.~~

Condition D.1.8:

Condition is renumbered to Condition D.1.5 because Conditions D.1.4, D.1.6, and D.1.7 have been removed. In addition, all references and requirements pertaining to press No. 6 are removed.

D.1.8**5** Record Keeping Requirements

~~(a)~~ To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below for each press. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(~~1~~**a**) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(~~2~~**b**) A log of the dates of use;

(~~3~~**c**) The volume weighted VOC content of the coatings used for each day;

(~~4~~**d**) The cleanup solvent usage for each day;

(~~5~~**e**) The total VOC usage for each day; and

(~~6~~**f**) The weight of VOCs emitted for each compliance period.

~~(b) Pursuant to 326 IAC 8-1-12(c), on and after May 1, 1997, or on and after startup of a new coating facility, or upon changing the method of compliance for an existing coating facility from the use of compliant coatings or daily-weighted averaging to control devices, the Permittee shall collect and record each day and maintain all of the following information each day for Press 6 (ID No. 1-2-P6):~~

~~(1) The name and identification number of each coating used at the coating facility.~~
~~(2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at the coating facility.~~
~~(3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on the coating facility.~~
~~(4) The required overall emission reduction efficiency for each day for the coating facility.~~
~~(5) The actual overall emission reduction efficiency achieved for each day for the coating facility as determined during the compliance test required by 326 IAC 8-1-12(b)(1)(C).~~
~~(6) Control device monitoring data as follows:~~

~~(A) For catalytic incinerators, the following:~~

~~(i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator.~~
~~(ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance.~~
~~(iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.~~

~~(7) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.~~
~~(8) A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.~~

~~(c)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Condition D.1.9:

Condition D.1.9 is removed because it pertains to press No. 6 only.

~~D.1.9 Reporting Requirements~~

~~(a) Pursuant to 326 IAC 8-1-12(d), on and after May 1, 1997, the Permittee shall notify the department in either of the following instances for Press 6 (ID No. 1-2-P6):~~

~~(1) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to the department within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:~~

~~(A) Name and location of the coating facility.~~
~~(B) Identification of the control system where the noncompliance occurred and the coating facility it served.~~
~~(C) Time, date, and duration of the noncompliance.~~
~~(D) Corrective action taken.~~

~~(2) At least thirty (30) calendar days before changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the owner or operator shall comply with all applicable requirements of 326 IAC 8-1-10(b) or 326 IAC 8-1-11(b), respectively. Upon changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the owner or operator shall comply with all requirements of 326 IAC 8-1-10 or 326 IAC 8-1-11, respectively, applicable to the coating facility subject to 326 IAC 8-5-5.~~

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The table of contents shall be amended as follows to remove all conditions pertaining to press No. 6.

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All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF
cc: File - Marshall County
U.S. EPA, Region V
Marshall County Health Department
Northern regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Bomarko, Inc.
1955 North Oak Road
Plymouth, Indiana 46563

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T099-7713-00021	Date Issued: March 11, 1999

First Administrative Amendment No.: T099-13815-00021	Date Issued: March 8, 2001

Second Administrative Amendment No.: T099-14912-00021	Affected Pages: 3, 5, 6, 29, 30, 31, 32 and 33.
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary waxed and coated paper and foil roll and sheeted stock manufacturing operation.

Responsible Official:	Kimball L. Mancke, President/Chief Operating Officer
Source Address:	1955 North Oak Road, Plymouth, Indiana 46563
Mailing Address:	P.O. Box K, Plymouth, Indiana 46563
SIC Code:	2671
County Location:	Marshall
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) one (1) flexographic rotogravure printing press (ID No. 1-2-P1), with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P1-1);

(2) one (1) flexographic rotogravure printing press (ID No. 1-2-P2), with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P2-1);

(3) one (1) rotogravure printing press (ID No. 1-2-P3), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);

(4) one (1) rotogravure printing press (ID No. 1-2-P4), with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);

(5) one (1) rotogravure printing press (ID No. 1-2-P5), with a maximum line speed of 1,200 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);

(6) one (1) flexographic printing press (ID No. 1-2-P7), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks

(ID Nos. 1-2-P7-1 and 1-2-P7-2);

(7) one (1) rotogravure printing press (ID No. 1-2-P8), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);

(8) one (1) flexographic printing press (ID No. 1-2-P9), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1);

(9) one (1) flexographic printing press, identified as PW2, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches; and

(10). one (1) paper-fired boiler (ID No. 1-1A-J), also burning natural gas at a maximum heat input rate of 3.0 million British thermal units (MMBtu) per hour, with a woven fiberglass fabric baghouse for PM control, exhausting through one (1) stack (ID No. 1-1A-J-1).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:

(a) one (1) hot water boiler, rated at 0.164 MMBtu per hour;
(b) two (2) hot water boilers, each rated at 0.66 MMBtu per hour;
(c) one (1) boiler, rated at 2.14 MMBtu per hour;
(d) one (1) hot water boiler, rated at 2.58 MMBtu per hour; and
(e) one (1) boiler, rated at 1.5 MMBtu per hour.

(2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:

(a) one (1) Safety Kleen cold parts cleaner.

(3) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22); and

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) one (1) flexographic rotogravure printing press (ID No. 1-2-P1), with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P1-1);
(2) one (1) flexographic rotogravure printing press (ID No. 1-2-P2), with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P2-1);
(3) one (1) rotogravure printing press (ID No. 1-2-P3), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);
(4) one (1) rotogravure printing press (ID No. 1-2-P4), with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);
(5) one (1) rotogravure printing press (ID No. 1-2-P5), with a maximum line speed of 1,200 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);
(6) one (1) flexographic printing press (ID No. 1-2-P7), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
(7) one (1) rotogravure printing press (ID No. 1-2-P8), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
(8) one (1) flexographic printing press (ID No. 1-2-P9), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1); and
(9) one (1) flexographic printing press, identified as PW2, with a maximum line speed of 1250 feet per minute and a maximum printing width of 60 inches.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5] [326 IAC 2-2]

Pursuant to 326 IAC 8-5-5, the Permittee may not cause, allow, or permit the operation of Presses 1-2-P3, 1-2-P4, 1-2-P5, 1-2-P7, 1-2-P8, and 1-2-P9 employing solvent-containing ink unless:

(a) the volatile fraction of the ink, as it is applied to the substrate, contains 25% by volume or less of

volatile organic compound (VOC) and 75% by volume or more of water; or

(b) the ink as it is applied to the substrate, less water, contains 60% by volume or more nonvolatile material; or

(c) the owner or operator installs and operates:

(1) a carbon adsorption system that reduces the VOC emissions from the capture system by at least 90% by weight;
(2) an incineration system that oxidizes at least 90% of the nonmethane VOC to carbon dioxide and water; or

(3) an alternative VOC emission reduction system demonstrated to have at least a 90% reduction efficiency, measured across the control system, and has been approved by the commissioner; or

(d) for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of 0.5 pound of VOC per pound of solids in the ink.

(e) A capture system must be used in conjunction with the emission control systems specified in paragraph (c) above. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of:

(1) seventy-five percent (75%) for publication rotogravure processes;
(2) sixty-five percent (65%) for packaging rotogravure processes; and
(3) sixty percent (60%) for flexographic printing processes.

(f) To ensure that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply, the input of VOC to the nine (9) presses and the usage of cleanup solvent for the nine (9) presses [the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent] shall be limited to 239.65 tons used per 12 consecutive months period. This limitation will prevent the VOC emissions from the entire source being greater than 249 tons per year.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to perform compliance stack tests at this time. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below for each press. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(a) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(b) A log of the dates of use;

(c) The volume weighted VOC content of the coatings used for each day;

(d) The cleanup solvent usage for each day;

(e) The total VOC usage for each day; and

(f) The weight of VOCs emitted for each compliance period.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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